

US EPA ARCHIVE DOCUMENT

Retail Gasoline Sales Sector
Environmental Results Project
VT Department of Environmental Conservation
Waste Management Division

For the Period:
October 1, 2006 to December 31, 2006

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This is the eighth report for the VT Department of Environmental Conservation "Retail Gasoline Sales Sector, Environmental Results Project (ERP). The report covers the time period October 1, 2006 to December 31, 2006.

Most of the time in this quarter was spent finalizing the regulations and beginning the adoption process (ongoing), and working with the regulated community on finalizing the self-certification checklist (completed).

Progress Toward Milestones (based on the 11/15/04 draft timeline):

1. We have completed our internal review of the following items:
 - a. The revised UST Regulations.
2. IT Tasks – Our IT specialist (Michael Inners) suspended work on our UST database (to allow us to store and manipulate ERP data) due to demands from other programs. Over the next quarter, we will be developing the on-line filing of self-certification forms, as well as formatting tablet personal computers to allow for the direct down-load of inspection data from the field to the database.
3. Industry Outreach: We have continued to provide monthly updates on the project to industry. We completed work with industry to review the self-certification checklist. To assist industry with their review, we posted the draft documents on our web site. The most frequent comment we received from industry was the checklist is too lengthy. After additional review, we were able to trim the document down by about 12 pages. In addition, we presented information on the Self-Certification program at the annual meeting of the VT Petroleum Association on December 19, 2006. We have only received one comment requesting we abandon the self-certification program due to the potential cost to industry and because EPA will not accept self-certification in lieu of inspections.
4. UST Regulations Revisions: We continued the internal rule-adopting process for DEC. The draft regulations were reviewed by Division Directors and the Commissioner of the Department prior to introducing the documents to the larger review committees (State Agencies and then Legislature). The last step of this internal process is review by the Secretary of the Agency of Natural Resources. Unfortunately, a new Secretary was appointed in late December (started work January 9, 2007) and the Acting Secretary deferred to the new Secretary.

Impediments:

UST Service and Repair Industry: Based on input from industry (in addition to delays in getting the regulations adopted and program experience), we have pushed the due date for self-certification to September 2007. This date allows enough time for most

owner/operators to conduct their self-inspection, hire contractors to conduct repairs, and file their certification. A September self-certification date also allows enough time for return to compliance plans to be completed before the winter weather sets in.

UST Regulations Adoption: The UST Regulations must still be reviewed and approved by the new Secretary, in addition to review by two committees. The Legislative Committee on Administrative Rules is of particular concern since the Legislature is currently in session.

Financial Report:

Financial Information Deleted by EPA as Confidential Business Information

QAPP Revision: there were no revisions to the QAPP this quarter.